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Please Respond to:
New York, NY

June 12, 2024

VIA ECF ONLY

Vera M. Scanlon, U.S.D.J.
United States District Court,
Eastern District of New York
225 Cadman Plaza East, 1214 South
Courtroom 13A, South Wing
Brooklyn, NY 11201

Re: Minglai Jin and Chen Liang v. Propark America New York, LLC
D/L : 4/8/2023
Our File : MMEM-00115RT

Dear Judge Scanlon,

We represent the defendant ProPark America New York, LLC ("ProPark") in this litigation. We write to advise you on the status of discovery, and to request a conference with the Court to address the schedule for outstanding discovery.

This action, alleging causes sounding in negligence for property damage to plaintiffs' vehicles, was originally filed in the Southern District of New York on October 6, 2023, and was subsequently transferred to the Eastern District of New York on February 6, 2024.

On March 27, 2024, this office served, *inter alga*, a set of interrogatories and combined discovery demands on counsel for plaintiffs. This office contacted plaintiff in an effort to obtain the outstanding discovery on April 18, 2023 and on May 16, 2024 by telephone. However, despite this office's attempt to obtain the discovery, to date, this office has not received a response, and plaintiffs have not responded to our interrogatories and combined discovery demands.

This office has attempted to make a good-faith effort to conference these matters prior to making a discovery motion.

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We have not yet received responses to our interrogatories and combined discovery demands describe above, and as the deposition dates remain outstanding, we respectfully request a conference to address outstanding discovery.

To date, we have not received any records pertaining to the alleged property damage to plaintiffs' vehicles and other documentation requested in our interrogatories and combined discovery demands. As such, we have been unable to evaluate this case for potential settlement.

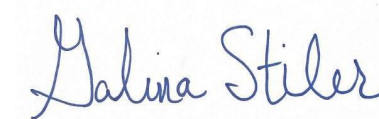
We have attempted in good faith to resolve these discovery disputes, but to no avail. We respectfully request that the Court direct the attorneys for the parties to appear before Your Honor for a conference to address the status of discovery.

Thank you for Your Honor's time and consideration

Very truly yours,

SMITH MAZURE, P.C.

By:



GALINA STILER

GS/myw

cc: Via ECF Only

Hon. Mag. Judge Vera M. Scanlon
Eastern District of New York

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